



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 16, 2005

Certified Mail No. 7005 0390 0003 2967 8175

Julie Thompson, President
Thompson Paving, Inc.
P.O. Box 757
Rexburg, ID 83440

RE: Facility ID No. 777-00299, Thompson Paving, Rexburg
Final Permit Letter

Dear Ms. Thompson:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050507 for the hot-mix asphalt plant, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on July 18, 2005. This permit is effective immediately. This permit does not release Thompson Paving from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0500 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Martin Bauer". The signature is fluid and cursive.

Martin Bauer, Administrator
Air Quality Division

MB/DP/sd

Permit No. P-050507

Enclosures



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: P-050507

Facility ID No: 777-00299

AQCR: XX

CLASS: SM

SIC: 2951

ZONE: XX

UTM COORDINATE (km): Portable

1. PERMITTEE

Thompson Paving Inc.

2. PROJECT

Portable Hot-mix Asphalt Facility

3. MAILING ADDRESS

P.O. Box 757

CITY

Rexburg

STATE

ID

ZIP

83440

4. FACILITY CONTACT

Julie Thompson

TITLE

President

TELEPHONE

(208) 356-7131

5. RESPONSIBLE OFFICIAL

Bob Thompson

TITLE

General Manager

TELEPHONE

(208) 356-7131

6. EXACT PLANT LOCATION

Portable

COUNTY

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Hot-mix asphalt production

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq


TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

September 16, 2005

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. STATEWIDE REQUIREMENTS.....	4
2. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED ...	8
3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED	9
4. NONATTAINMENT AREA REQUIREMENTS	10
5. APPENDIX	11
6. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	12

Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MMBtu	million British thermal units
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

1. STATEWIDE REQUIREMENTS

The permittee shall comply with the following conditions when the hot-mix asphalt (HMA) facility is operated anywhere (nonattainment, attainment, or unclassifiable areas) within the state of Idaho.

1.1 Emission Limits

1.1.1 Asphalt Dryer Emission Limits

Particulate matter (PM) emissions from the HMA dryer stack shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), nor shall particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) emissions from the HMA dryer stack exceed the emission rate limit listed in the appendix of this permit.

1.1.2 Other Particulate Matter Emission Limits

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from a stack, vent, or other functionally equivalent opening, shall not contain PM emissions in excess of 0.04 gr/dscf.

1.1.3 Opacity Limit

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

1.1.4 Visible Emission Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

1.2 Operating Requirements

1.2.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

1.2.2 Dryer Burner Fuel Limits

The burner fuel shall be distillate fuel oil, propane or natural gas only.

1.2.3 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment. A scrubbing media flow rate monitor is required only if a wet scrubber is used to control some or all of the emissions from the HMA plant.

1.2.4 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an Operations and Maintenance (O&M) Manual for the air pollution control device which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

1.2.5 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within the manufacturer and O&M Manual specifications. Documentation of both the manufacturer and O&M Manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

1.3 Monitoring And Recordkeeping Requirements**1.3.1 Operating Parameters**

The following parameters shall be monitored and recorded. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request:

- Pressure drop across the air pollution control device once on a daily basis.
- HMA production in tons per day (T/day) and tons per month (T/mo).

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

1.3.2 Reasonable Control Measures

The permittee shall monitor and record in a log, during operation, the periodic method(s) used to reasonably control fugitive dust emissions from this facility. The log shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

1.3.3 Monitor Generator Hours of Operation

The permittee shall monitor and record the generator's hours of operation on a monthly basis if generator hours of operation are limited in Permit Condition No. 1, 2, or 3. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

1.3.4 PM and PM₁₀ Performance Testing Requirements

If a PM test has not been conducted in accordance with 40 CFR 60.93 within the past five years, then within 180 days issuance of this permit, a performance test shall be conducted on the HMA facility under worst-case normal operating conditions in accordance with 40 CFR 60.93, IDAPA 58.01.01.157, and General Provision 6 of this permit. The performance test shall be conducted to demonstrate compliance with the 0.04 grains of PM per dry standard cubic foot (gr/dscf) emissions limit, the pound per hour PM₁₀ emissions limit of Permit Condition 1.1.1, and the 20% opacity emissions limits of Permit Conditions 1.1.3 and 1.1.4. The following shall be monitored and recorded during the performance tests:

- A description of how the test represents worst-case normal operating condition for the HMA facility;
- The hourly production rate of the hot-mix asphalt plant expressed as tons per hour;
- The pressure drop across the air pollution control device and the scrubbing media flow rate of that device. If the HMA facility utilizes a baghouse instead of a wet scrubber, then only record the pressure drop across the baghouse; and
- The visible emissions observed during the performance tests from the HMA facility stack and visible emissions observed at the property boundary.

1.3.5 Performance Testing Frequency and Records

The permittee shall conduct performance tests at a frequency of no less than once every five years in accordance with Permit Condition 1.3.4.

The permittee shall maintain a copy of the performance test results of the most recently conducted stack test on this asphalt facility. This report shall be made available to DEQ representatives upon request.

1.4. Reporting Requirements**1.4.1 Performance Test Protocol**

Prior to conducting any emission test, the permittee is strongly encouraged to submit in writing to DEQ, at least 30 days in advance, a performance test protocol in accordance with IDAPA 58.01.01.157.01.a.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

1.4.2 Performance Test Report

In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of completion of the test.

1.4.3 Relocation

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a complete Portable Equipment Registration and Relocation Form (available on DEQ website at: www.deq.state.id.us/air/permits_forms/forms/pte_relocation.pdf) in accordance with IDAPA 58.01.01.500 and a scaled plot plan to:

PERF Processing Unit
Idaho Department - Air Quality
1410 N. Hilton
Boise, ID 83706-1255

1.4.4 Certification of Documents

All documents, including, but not limited to, application forms for permits to construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

2. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is operated in any attainment or unclassifiable areas, and when it is not collocated, within the state of Idaho.

2.1 Operating Requirements**2.1.1 Facility Throughput Limits**

The production rate of the HMA facility shall not exceed a maximum of 876,000 tons per any consecutive 12-month period when located in any attainment or unclassifiable area.

2.1.2 Collocation Requirements

When the HMA facility is to be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant; the permittee must comply with the collocation requirements of Permit Condition No. 3.

2.1.3 Generator Hours of Operation

The generator shall not be operated more than 8,760 hours per any consecutive 12-month period when located in any attainment or unclassifiable area.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho	777-00299		

3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is to be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant within the state of Idaho. The HMA facility may only collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable HMA plant that has been permitted to specifically allow collocation.

3.1 Operating Requirements**3.1.1 Collocation Areas**

The HMA facility may collocate in attainment or unclassifiable areas only. The permittee shall not collocate in a nonattainment area, or proposed nonattainment area, without obtaining a permit that specifically allows for collocation in a nonattainment area.

3.1.2 Number of Portable Sources

The HMA facility may only collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable HMA plant that has been permitted to specifically allow collocation.

3.1.3 Facility Throughput Limits

The production rate of the HMA facility shall not exceed a maximum of 438,000 tons per any consecutive 12-month period when collocated with another HMA plant, concrete batch plant, or rock-crushing plant.

3.1.4 Generator Hours of Operation

The generator shall not be operated more than 4,380 hours per consecutive 12-month period when collocated with another HMA plant, concrete batch plant, or rock-crushing plant.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No. 777-00299	Date Issued:	September 16, 2005
Location:	Rexburg, Idaho			

4. NONATTAINMENT AREA REQUIREMENTS

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is operated in any PM₁₀ nonattainment areas within the state of Idaho. While operating the HMA facility under the conditions set forth in Permit Condition 4, the HMA facility may not collocate with any other facility.

4.1 Operating Requirements**4.1.1 Facility Throughput Limits**

The production rate of the HMA facility shall not exceed a maximum of 158,146 tons per any consecutive 12-month period when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.2 Collocation Requirements

The HMA facility shall not be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.3 Generator Hours of Operation

The generator shall not be operated more than 1,581 hours per any consecutive 12-month period when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.4 Sandpoint Nonattainment Area

The HMA facility shall not operate in the Sandpoint PM₁₀ nonattainment area.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No. 777-00299	Date Issued: August 23, 2005
Location:	Rexburg, Idaho		

5. APPENDIX**PORTABLE HOT-MIX ASPHALT FACILITY****HOURLY PM₁₀ EMISSION LIMITS**

Source Description	PM₁₀ (lb/hr)^a
Dryer stack outlet	3.47

^a As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emission estimation methods used in the permit application analysis.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No.	Date Issued:	August 23, 2005
Location:	Rexburg, Idaho	777-00299		

6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050507

Permittee:	Thompson Paving, Inc.	Facility ID No. 777-00299	Date Issued:	August 23, 2005
Location:	Rexburg, Idaho			

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.